

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

CHRISTOPHER LACCINOLE,

Plaintiff,

v.

GULF COAST COLLECTION BUREAU,  
INC., JACK WARREN BROWN, III, MARIE  
S. ARESKOG, AND DOES 1-20  
INCLUSIVE,

Defendant.

CIVIL ACTION NO. 1:22-cv-223

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, the defendants Gulf Coast Collection Bureau, Inc., Jack Warren Brown III, and Marie S. Areskog (collectively “Defendants”), file this Notice of Removal, and as grounds state as follows:

1. On or about May 11, 2022, the plaintiff, Christopher Laccinole (“Plaintiff”), filed his Complaint against the Defendants in Washington County Superior Court in the State of Rhode Island. The caption of the Complaint is: *Christopher Laccinole v. Gulf Coast Collection Bureau, Inc., et al.*, Washington County Superior Court, Case No. WC-2022-0161 (“the State Court Action”).
2. The Defendants were served with the Complaint on May 19, 2022.
3. Removal is timely under 28 U.S.C. § 1446(b), as fewer than 30 days have passed since the Defendants first received a copy of the Complaint.
4. A copy of the Complaint and all other process, pleadings, and orders served upon the Defendants are attached as Exhibit “A”.

5. Plaintiff's State Court Action alleges violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* ("FDCPA"), and the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.* ("TCPA").

6. As such, the State Court Action involves a question of federal law. Pursuant to 28 U.S.C. § 1331, "The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States."

7. Pursuant to 28 U.S.C. § 1441(a), "[a]ny civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the defendant or the defendants, to the district court of the United States for the district and division embracing the place where such action is pending."

8. Since this case arises out of alleged violations of the FDCPA and the TCPA, Defendants may properly remove the State Court Action to the United States District Court for the District of Rhode Island based on 28 U.S.C. § 1441(a). All defendants consent to the removal.

9. Notice of this removal will promptly be filed with the Rhode Island Superior Court for Washington County and be served on all adverse parties.

10. Plaintiff has requested a jury trial in the state court matter.

WHEREFORE, Defendants Gulf Coast Collection Bureau, Inc., Jack Warren Brown III, and Marie S. Areskog, pray that the State Court Action be removed from the Superior Court of Rhode Island, Washington County, Case No. WC-2022-0161, to this Court for proper and just determination.

GULF COAST COLLECTION BUREAU, INC.,  
JACK WARREN BROWN, III, and  
MARIE S. ARESKOG,  
By their Attorneys,

/s/ Susan M. Silva

Timothy O. Egan, #9239  
Susan M. Silva, #9505  
Peabody & Arnold, LLP  
Federal Reserve Plaza  
600 Atlantic Avenue  
Boston, MA 02110-2261  
Telephone: (617) 951-2010  
[tegan@peabodyarnold.com](mailto:tegan@peabodyarnold.com)  
[ssilva@peabodyarnold.com](mailto:ssilva@peabodyarnold.com)

With an office at:  
40 Westminster Street  
Providence, RI 02903

**CERTIFICATE OF SERVICE**

I, Susan M. Silva, hereby certify that on this 8<sup>th</sup> day of June, 2022, I served the attached by causing a copy thereof to be served via email and First-Class Mail on the following:

Christopher Laccinole  
23 Othmar St.  
Narragansett, RI 02882  
[chrislaccinole@gmail.com](mailto:chrislaccinole@gmail.com)

/s/ Susan M. Silva

Susan M. Silva

2337551  
1518-201